



# University of Hawaii at Manoa

Environmental Center  
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March 29, 1989  
RP:0100

Mr. James K. Ikeda  
Acting Chief  
Environmental Protection  
and Health Services  
P.O. Box 3378  
Honolulu, Hawaii 96801

Dear Mr. Ikeda:

Water Quality Certification No. 130  
Honoli'i Hydroelectric Power Project  
South Hilo District, Hawaii

We have reviewed the Draft Environmental Impact Statement (EIS) for the above referenced project and we have enclosed a copy of our comments for your information. Two of our comments deserve special emphasis:

1. Sedimentation and its control, both during and after construction have not been adequately addressed. Once the area is stabilized and re-vegetated, instream turbidity will still increase because of lower average flow rates. While the actual rate of erosion may remain the same, decreased stream flow (especially in the 3.7 mile reach of the stream that has been bypassed by the penstock) will result in decreased dilution and transport of entrained sediments.
2. In the DEIS (p. 112, para. 2), it states that volume and flow rate will be decreased as a result of diversion of the stream. On the basis of the onetime, one season field survey conducted for the Draft EIS, it is not clear that the reduced frequency and flow of the freshets will be sufficient to flush the pools and maintain water quality "well within the tolerance levels of the stream fauna". Such a determination can be made only on the basis of an IFIM study such as that recommended by the U. S. Fish and Wildlife Service (DEIS, p. 174).

Mr. James K. Ikeda

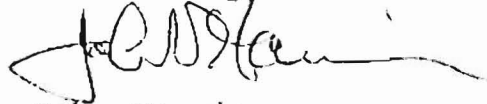
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Also, in reference to item number five (5) of the WQC initial staff determination, on April 3, 1988, the State Commission on Water Resource Management identified Honoli'i Stream as a "high-value" stream in regards to the proposed Interim Instream Flow Standards for Hawaii. While this designation may not correspond directly with the Department of Health classification criteria for the WQC process, we feel that such CWRM evaluations are directly relevant to stream quality management processes, and therefore it is appropriate to bring this to your attention.

Thank you for the opportunity to comment on this document.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Harrison', written over a horizontal line.

John Harrison  
Environmental Coordinator

Attachment

cc: OEQC  
William Paty  
L. Stephen Lau  
C. Anna Ulazewski